

1 THE HONORABLE JAMES L. ROBART  
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8 UNITED STATES DISTRICT COURT  
9 WESTERN DISTRICT OF WASHINGTON  
10 AT SEATTLE

11 CYWEE GROUP LTD.,

Case No.: 2:17-cv-00932-JLR

12 Plaintiffs,

13 v.

14 HTC CORPORATION, and HTC AMERICA,  
15 INC.,

16 Defendants.

17 **DECLARATION OF KARL STRAATVEIT  
18 IN SUPPORT OF  
19 STMICROELECTRONICS, INC.'S  
20 MOTION TO DISMISS**

21 HTC CORPORATION, and HTC AMERICA,  
22 INC.,

23 Third-Party Plaintiffs,

24 v.

25 STMICROELECTRONICS N.V.,  
26 STMICROELECTRONICS, INC., and CYWEE  
27 MOTION GROUP LTD.,

28 Third-Party Defendants.

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2       1. My name is Karl Straatveit. I am the Senior Accounting Manager of  
 3 STMicroelectronics, Inc., (“ST Inc.”) a title which I have held for eight years. My responsibilities  
 4 include oversight of various accounting matters for ST Inc. In total, I have been employed by ST  
 5 Inc. for 17 years. I have personal knowledge of the facts herein. I am competent to testify to all  
 6 of the facts herein.

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2       2. ST Inc. is the indirect subsidiary of STMicroelectronics N.V., a Dutch  
 3 holding company headquartered in the Netherlands that is the ultimate parent to more than 60  
 4 companies around the world. ST Inc.’s affiliates in Europe and Asia are engaged in the design,  
 5 manufacture and sale of semiconductors for use in a wide variety of commercial and consumer  
 6 products. ST Inc. does not manufacture any semiconductor products. Rather, ST Inc.’s principal  
 7 business is the sale of semiconductor products to U.S. customers.

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3       3. I understand that HTC Corporation sent a letter to ST Inc. dated October 2,  
 4 2017, which referenced the purchase order attached as Exhibit A (“Purchase Order”). The  
 5 Purchase Order is directed to STMicroelectronics Asia Pacific Pte. Ltd. (“ST Asia”) and not ST  
 6 Inc. The Purchase Order purports to order STM32F411CEY6TR controllers. ST Inc. did not  
 7 receive, fulfill, or play any role in connection with the Purchase Order. Nor has ST Inc. ever sold  
 8 or supplied STM32F411CEY6TR controllers to either HTC Corporation or HTC America, Inc.  
 9 (collectively, “HTC”).

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4       4. I further understand that HTC filed a third-party complaint against ST Inc.  
 5 alleging that ST Inc. sold and supplied “motion sensor devices” to HTC pursuant to a purchase  
 6 order that requires ST Inc. to defend and indemnify HTC with respect to claims of patent  
 7 infringement. HTC’s allegations are not true. ST Inc. has never sold or supplied any motion  
 8 sensor devices to HTC, or agreed to defend or indemnify HTC in connection with claims of patent  
 9 infringement against any motion sensor devices. There are no purchase orders or contracts  
 10 between HTC and ST Inc. relating to motion sensor devices.

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1           5. I declare under penalty of perjury under the laws of the United States that  
2 the foregoing is true and correct.  
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4           Executed this March 26, 2018, at Coppell, Texas.  
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6           /s/ Karl Straatveit  
7           Karl Straatveit  
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## **CERTIFICATE OF SERVICE**

I hereby certify that on March 26, 2018, I filed the foregoing with the Clerk of the Court using the CM/ECF system, and served all parties via ECF.

Dated: March 26, 2018

s/ Matt Berkowitz  
Matt Berkowitz